FILED

I MITED STATE	ES DISTRICT COURT
DISTRICT OF	MASSACHUSEETES PM 2 16
FILED U	JNDER SEALS. DISTRICT COURT DISTRICT OF MASS.
UNITED STATES OF AMERICA	
v.)	CRIMINAL NO. 13-10200-GAO
DZHOKHAR TSARNAEV	

SEALED MOTION TO SEAL AND FOR LEAVE TO FILE REPLY TO GOVERNMENT'S OPPOSITION TO DEFNENDANT'S MOTION TO BAR SPOLIATION OF BOAT WRITINGS AND TO MAKE BOAT AVAILABLE TO JURY

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully moves for leave to file a Reply to the Government's Opposition ("Opp.") [DE 944] to Defendant's Motion to Bar Spoliation of Boat Writings and to Make Boat Available to Jury [DE 918] and to do so under seal.

As grounds therefor, the filing should be sealed because prior filings in connection with the motion were made under seal. A reply will assist the Court by focusing issues in dispute and responding to matters raised in the government's Opposition.

Respectfully submitted,

DZHOKHAR TSARNAEV by his attorneys

Judy Clarke, Esq. (CA Bar # 76071)

Menz

CLARKE & RICE, APC

1010 Second Avenue, Suite 1800

San Diego, CA 92101

(619) 308-8484 JUDYCLARKE@JCSRLAW.NET

David I. Bruck, Esq. 220 Sydney Lewis Hall Lexington, VA 24450 (540) 460-8188 BRUCKD@WLU.EDU

Miriam Conrad, Esq. (BBO # 550223)
Timothy Watkins, Esq. (BBO # 567992)
William Fick, Esq. (BBO # 650562)
FEDERAL PUBLIC DEFENDER OFFICE
51 Sleeper Street, 5th Floor
(617) 223-8061
MIRIAM_CONRAD@FD.ORG
TIMOTHY_WATKINS@FD.ORG
WILLIAM FICK@FD.ORG

Certificate of Service

I hereby certify that I have caused this document to be served upon counsel for the United States buy e-mail PDF on February 25, 2015.